



CALFED
BAY-DELTA
PROGRAM

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Public Comment

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The CALFED Bay-Delta Program welcomes your participation. Please use the space below for your written comments (attach additional sheets if necessary).

Comments:

See attached memo

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8/9/99 Shortened Draft

**Critique of CALFED by Alex Hildebrand
(Member of Bay Delta Advisory Council, Farmer, Engineer,
Director of South Delta Water Agency)**

CALFED is the "only game in town" that can potentially and effectively seek to improve the management of California's water resources in order to take better care of the environment while also meeting society's other water needs. In pursuing this objective it has many able people on its staff. However, CALFED must insist on the unbiased application of "good science" and must adhere to its commitment that all needs will "get better together".

CALFED's program development appears to be dominated by adopting almost any perceived benefit for fish that is consistent with "no net loss" to exports. There is no comparable attempt to protect agriculture and to protect water supplies for non-export water users, or to solve problems for other interrelated interests.

California supports its current population in part by depleting natural resources. We get through droughts by producing food with an enormous and unsustainable overdraft of groundwater. We are destroying the fertile soils and groundwaters in the south central valley by refusing to remove millions of tons of salt that is imported into the valley. This is Bay salt that is contained in the imported water. Furthermore, CALFED proposes to take large amounts of land and water from agriculture for environmental and urban use instead of meeting new needs with adequate new water development.

In developing its plans for alterations to Delta channels and to water management in the Delta, and to conveyance through the Delta, CALFED has largely ignored the expertise and needs of Delta interests such as the Delta's agriculture community, the three Delta Water Agencies, the Delta Protection Commission, and Delta counties.

CALFED's arrogance and selective use or disregard of "good science" was perhaps at its worst when it recently adopted a new water management plan for the South Delta. The plan overrides the 1991 settlement agreement among the Department of Water Resources, the Bureau of Reclamation, and the South Delta Water Agency (SDWA). That agreement provided that three operable tidal flow control barriers would be provided in the South Delta to capture high tide water and hold it in the channels for use by agriculture during low tides. South Delta's agriculture has about 150 small diversion pumps to take water from 75 miles of channels. Most of these channels are shallow, and, without the barriers, operation of the CVP export pumps periodically reduces water depths during low tides so that farmers can not irrigate their crops. The barriers also mitigate other impacts

2of export pumping such as by maintaining downstream flow in the San Joaquin River upstream of Stockton. Furthermore, several hundred thousand tons of the previously mentioned salt load that is imported into the valley by the CVP drains annually into the San Joaquin River. Operation of the three tidal barriers shunts this salt toward the Bay where it originated. In the absence of the three barriers the salt is drawn to the CVP pumps and reexported. This reexport of salt further increases the drainage of imported salt to the river, and increases the need for dilution water from the overcommitted New Melones Reservoir. This in turn reduces the New Melones water supply available for fish flows and for delivery to the eastern part of San Joaquin County.

At a public meeting the Delta interests were told explicitly that nothing we said or suggested or requested would have any influence on the CALFED plan that was to be adopted.

The plan includes taking water into the State Water Project's forebay during low tides, which it does not now do. This change will very substantially increase the depletion of the in-channel water depth needed for operation of irrigation pumps. The plan also provides that only the two smaller tidal barriers shall be allowed, and that they can only be operated part of the time. The high tide water captured by these two barriers will therefore run out through Grantline Canal which will have no barrier. The plan will shift the reexport of the salt in the San Joaquin River in substantial part from CVP exports to SWP exports where it will impact the quality of urban water supplies. The plan will also increase rather than prevent the reverse flow in the San Joaquin River that is a major cause of the problem of inadequate dissolved oxygen (DO) for fish in that reach. No rigorous scientific data have been presented to defend the notion that the Grantline barrier would be bad for fish. In short, the plan will devastate South Delta agriculture by damage to its inchannel water supply. It will exacerbate the DO problem in the San Joaquin River. It will increase the salt load in the State Aqueduct, and it will not provide the reduced burden on New Melones that would result if there were three tidal barriers that were operated most of the time. The plan refers to possible reconsideration of a Grantline barrier, but only if fishery agencies decide after years of trial that alleged fishery benefits are not sufficient in their judgement to justify the impact on agriculture. The need to mitigate the impact of export pumping is not considered a priority. All of San Joaquin County will be damaged by the plan.

Another component of CALFED's South Delta "early implementation plan" was the adoption of a plan for providing spring fish flows into the South Delta with tributary water. CALFED adopted the plan without first evaluating an alternative that would provide most of the fish flow with recirculated water from the Delta Mendota Canal, and would thereby preserve the high quality tributary water for uses that would benefit Steelhead trout and summer water quality and flow into the South Delta, and would increase water availability for eastern San Joaquin

County, and would improve water quality for exports and in the San Joaquin River upstream of Vernalis.

Furthermore, there are no such evaluations in the Draft PEIS. CALFED has apparently also made no analysis of whether the plan is legally defensible. Does it comply with the Delta Protection Statutes, with water rights law, and with the obligation to mitigate adverse impacts of the export projects on third parties that have superior water rights?

The CALFED plan presented in the current draft PEIS must unfortunately be opposed. It would diminish agriculture as a whole while the state's need for agriculture increases as the population grows. In many areas it is far too vague to depict what will actually take place. In other areas it adopts specific implementation plans that are not supported by adequate, unbiased impact analyses, or even analyses to determine whether the proposals are technically sound, and whether they are compatible among interests, and legally defensible. It overrides county planning, and would impact the economy of San Joaquin County among others.

The overall plans and the early implementation plan must be revised with full local participation to make them technically sound, compatible among interests, and legally defensible.